

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**IN RE JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION**

**KIM M. IZZARD, individually and as  
administrator of the ESTATE OF MADELINE  
GRACE, DECEASED,**

Plaintiff,

v.

**JOHNSON & JOHNSON, JOHNSON &  
JOHNSON CONSUMER, INC., IMERYS TALC  
AMERICA, INC.,**

Defendants.

**MDL NO. 16-2738 (FLW)  
(LHG) JUDGE FREDA L.  
WOLFSON MAG. JUDGE  
LOIS H. GOODMAN**

COMPLAINT AND JURY DEMAND

Civil Action No.: 3:17-cv-07913

DIRECT FILED ACTION

**NOTICE OF FILING SHORT FORM COMPLAINT**

Plaintiff hereby gives notice that pursuant to Case Management Order No. 3 (Filing of Short Form Complaints) that the Short Form Complaint and Jury Demand was filed in the above-referenced case on October 5, 2017 on behalf of Plaintiff, Kim M. Izzard, individually and as administrator of the Estate of Madeline Grace, deceased.

Dated: October 5, 2017

Respectfully submitted,

/s/ Eric D. Pearson

Eric D. Pearson

Texas State Bar No. 15690472

eric@hop-law.com

HEYGOOD, ORR & PEARSON

6363 North State Hwy 161, Suite 450

Irving, Texas 75038

(214) 237-9001 Telephone

(214) 237-9002 Facsimile

**COUNSEL FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 5, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

/s/ Eric D. Pearson  
Eric D. Pearson

**ATTORNEY FOR PLAINTIFF**